

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

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|-------------------------------|---|----------------------------|
| STARS DESIGN GROUP, INC., |) | |
| |) | |
| Plaintiff, |) | |
| |) | Case No. 4:24-cv-00620-HEA |
| v. |) | |
| |) | |
| SUN COAST MERCHANDISE |) | |
| CORP. d/b/a SUNSCOPE, et al., |) | |
| |) | |
| Defendants. |) | |

DEFENDANTS’ MOTION FOR PROTECTIVE ORDER

COME NOW Defendants Jeff Back (“Back”), Sun Coast Merchandise Corp. d/b/a Sunscope (“Sun Coast”), and Staples Promotional Products, a division of Staples Contract & Commercial LLC (“Staples”) (collectively “Defendants”), by and through their undersigned counsel, and pursuant to Rule 26(c) of the Federal Rules of Civil Procedure respectfully move this Court for a Protective Order preventing Plaintiff from circumventing the recognized discovery procedures or utilizing or obtaining any additional documents from Defendants or their manufacturers improperly through Stars’ Indian subsidiary. In support of this Motion, Defendants refer the Court to its Memorandum in Support, contemporaneously filed herewith.

WHEREFORE, Defendants respectfully requests that this Court enter a Protective Order preventing Plaintiff from circumventing the recognized discovery procedure, utilizing or improperly obtaining documents.

Dated: July 3, 2024

Respectfully submitted,

McCARTHY, LEONARD & KAEMMERER, L.C.

BY: /s/ Alexander J. Lindley
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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via the court's efilings system on all attorney(s) of record on this 3rd day of July, 2024.

/s/ Alexander J. Lindley